



December 4, 2002

Docket # 01-BSTD-1

Robert Pernell, Commissioner, Presiding Member
Arthur H. Rosenfeld, Commissioner, Associate Member
2005 Update Residential & Nonresidential Building Standards Proceeding
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512

Dear Messrs. Pernell and Rosenfeld:

NEMA appreciates the opportunity to comment on the California Energy Commission 2005 Update Residential & Nonresidential Building Standards, Title 24. These comments are on the Workshop Draft 2 document (P400-03-001D2) for discussion at the November 18, 2002 meeting. The comments in this letter are on lighting controls and luminaire matters. Our comments are intended to provide design flexibility and eliminate requirements that are not relevant to performance. We reserve the right to provide further comments on this or other relevant topics.

In *Table 146-A LIGHTING SYSTEMS PERMITTED UNDER SECTION 146 (A)* there are several entries that appear to be incorrect.

In the column "Other limits" there are several entries for "Maximum input watts to luminaire" with essentially no allowance or even a negative allowance for power use by ballasts. Since all ballasts must meet federal efficiency standards we believe these entries are not needed and should be deleted.

The "Exit signs" "Maximum Lamp Watts" entry should be "Rated 5 watts or less per face", not "Rated 5 watts or less". 5 watts per face is the 2002 Title 20 energy efficiency standard.

In Section 146.4.E, all after "...activates half the lights." down to the end of 146.4.E should be deleted. The specific operating sequence is a design detail that may vary from product to product for products that satisfy the performance requirement. The operating sequence itself should not be regulated, as it could have the unintended consequence of banning products that meet the performance requirement.

Perhaps I misunderstood this, but one comment that I believe was made by a CEC consultant during the November 18, 2002 meeting, questioned the availability of lighting control occupancy sensors that have an "automatic off, manual on" feature. There are at least two manufacturers that make such controls.

Again, thank you for the opportunity to comment. I look forward to working with you further on the 2005 amendments under development.

Sincerely yours,

A handwritten signature in cursive script that reads "Edward Gray".

Edward Gray
Director, Energy Policy
National Electrical Manufacturers Association
1300 North 17th Street, Suite 1847
Rosslyn, VA 22209
Phone: 703-841-3265
Fax: 703-841-3365
Website: nema.org
Email: edw_gray@nema.org

cc: Bill Pennington, CEC staff